

May 12, 2011

CLERK, U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA

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Holly S. Burgess (State Bar No. 104575)  
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Attorneys for Plaintiff/Debtor  
JAMES L. MACKLIN

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

In re )  
 ) **CHAPTER 7**  
JAMES L. MACKLIN, )  
 ) **CASE NO. 2010-44610**  
Debtor, )  
 ) **DCN: HSB-002**

\_\_\_\_\_)  
JAMES L. MACKLIN, ) **ADV. NO. 11-02024-E**  
 )  
Plaintiff, )  
 ) **NOTICE OF PLAINTIFF/DEBTOR'S**  
-vs.- ) **MOTION FOR AN ORDER**  
 ) **COMPELLING TRUSTEE TO ABANDON**  
DEUTSCHE BANK NATIONAL TRUST CO., ) **PROPERTY**  
AS INDENTURE TRUSTEE FOR THE )  
ACCREDITED MORTGAGE LOAN TRUST )  
2006-2 ASSET-BACKED NOTES; and all ) **Date: June 9, 2011**  
persons claiming by, through, or under such ) **Time: 1:30 p.m.**  
person, all persons unknown, claiming any legal ) **Place: 501 I Street, 6th Floor, Courtroom 33**  
or equitable right, title, estate, lien, or interest in ) **Sacramento, California**  
the property described in the complaint adverse )  
to Debtor's title thereto; and )  
CORRESPONDENT DOES 1-10, Inclusive, )  
\_\_\_\_\_) **Defendant.**

**NOTICE OF HEARING ON MOTION TO COMPEL CHAPTER 7 TRUSTEE TO**  
**ABANDON PROPERTY OF THE ESTATE**  
**TO THE HONORABLE RONALD H. SARGIS, CHAPTER 7 TRUSTEE, AND ALL**  
**OTHER INTERESTED PARTIES:**

By this motion, Plaintiff/Debtor will, and hereby do, seek an order Compelling the Chapter 7 Trustee to Abandon Property of the Estate. Plaintiff/Debtor's motion is based upon this Notice of Hearing, the Motion, Declaration of Holly S. Burgess, and on such oral, and documentary evidence, authority and argument as may be presented at the hearing on this motion.

Pursuant to Local Rules, any opposition to the granting of the Motion shall be in writing supported by the written evidence, and shall be served and filed with the Clerk by the responding party not less than fourteen days preceding the noticed and continued dated of hearing. Copies of your opposition must be served on the following:

13	Holly S. Burgess	Office of the U.S. Trustee
14	Law Offices of Holly S. Burgess	501 I Street, Suite 7-500
	680 Auburn-Folsom Road, Suite 109	Sacramento, CA 95814
15	Auburn, CA 95603	

16 Trustee  
17 Thomas A. Aceituno  
18 PO Box 189  
Folsom, CA 95763

Without good cause, no party will be heard in opposition to the Motion at oral argument if written opposition to Motion has not been timely filed. Failure of the responding party to timely file written opposition may be deemed a waiver of any opposition to the granting of the Motion.

23 Dated: May 9, 2011

Respectfully submitted,

24 LAW OFFICES OF HOLLY S. BURGESS

26 By: /s/ Holly S. Burgess  
27 HOLLY S. BURGESS  
Attorneys for Plaintiff/Debtor